

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INTERNATIONAL FINANCE CORPORATION,
not in its individual capacity but solely as the
Trustee for the IFC-Netherlands Carbon Facility,

07 Civ. 5451 (SHS) (ECF)

Plaintiff,

-against-

KORAT WASTE TO ENERGY CO. LTD.,
(a/k/a KHORAT WASTE TO ENERGY CO.),

Defendant.

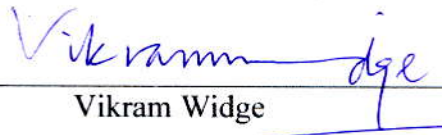
DECLARATION OF VIKRAM WIDGE

I, Vikram Widge, declare as follows:

1. I am the Program Manager for Carbon Finance for the International Finance Corporation (IFC) in Washington, D.C. I make this declaration based on my personal knowledge.
2. IFC incurred several categories of expenses directly related to the extended negotiations to draft an Emission Reduction Purchase Agreement ("ERPA") between IFC and Korat Waste to Energy Co. Ltd ("Korat"), including:
 - a. IFC staff salaries for drafting the ERPA;
 - b. Expenses for retaining outside English counsel for a separate review and revision of the ERPA;
 - c. Expenses for retaining outside Canadian counsel to assist in drafting, redrafting, and negotiating the ERPA;
 - d. IFC staff's wasted time in negotiating the ERPA;
 - e. IFC's overhead expenses; and
 - f. IFC's lost opportunity costs.
3. IFC is in the process of collecting the information necessary to quantify these damages.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 24, 2008
Washington, D.C.


Vikram Widge